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VIA ECF TO:

March 5, 2024

Honorable Justice Paul Oetken
United States District Court
Southern District of New York
40 Foley Square, Room 2101,
New York, NY 10007

Re: Almonte v JAM Maintenance, LLC., et al.
Case No: 1:22-cv-01820

Dear Honorable Justice Oetken:

My office represents the Defendants JAM MAINTENANCE, LLC and DIEGO RAMIREZ in the above captioned matter. I submit this letter to advise the Court of the status of this matter to date. Today, we participated in a 3 hour mediation session in which I believe we made some progress. We all agreed to continue the mediation to April 5, 2024 and in the interim, continue our efforts to resolve this matter by way of continued discussions with Plaintiffs' counsel.

Plaintiffs' counsel wishes to proceed with litigation while settlement discussions continue. We are not consenting to same in light of the fact that the very essence of engaging in good faith settlement discussions at the present time, is to avoid expending unnecessary legal fees for litigation, that could otherwise be better spent towards a settlement payment.

The mediation is scheduled for April 5, 2024, a mere 30 days from now, and there is no prejudice to the parties to wait until then to finalize our settlement efforts. If all fails at the next mediation session, we can proceed with litigation at that time, which we believe is a more reasonable approach. This is the position of all Defendants in this matter, since Mr. Binson is also agreeing to same. Accordingly, we respectfully defer to the Court's directives regarding this matter.

Thank you in advance for your consideration.

Very truly yours

s/Freda Khan
Freda Khan. (FK 4220)